IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA

JOHNNY C. FENN, JR., #238558	)	
	)	
Plaintiff,	)	
	)	**Civil Action No.: CV-05-515-F**
v.	)	
	)	
MIKE HUGHES, et al.,	)	
	)	
Defendants.	)	

MOTION FOR EXTENSION OF TIME

COMES NOW C. Winston Sheehan, Jr., an attorney with the law firm of Ball, Ball, Matthews & Novak, and respectfully requests this Honorable Court to extend the time allowed for filing a Special Report and Answer on behalf of defendant James B. Crowley in the above referenced matter by 60 days. As grounds for said motion, this attorney shows unto this Honorable Court that defendant is in the process of serving subpoenas on the office of the Pike County Sheriff and Edge Regional Medical Center in Troy, Alabama to obtain documents and information we believe are relevant. In an effort to submit as complete a report as possible, the defendant requests additional time so as to have an opportunity to obtain and review these documents pursuant to subpoena.

/s/ C. Winston Sheehan, Jr.
C. WINSTON SHEEHAN, JR.
Attorney for the Defendants,
Mike Hughes, Jim Mueller and James Crowley

OF COUNSEL:
BALL, BALL, MATTHEWS & NOVAK, P.A.
2000 Interstate Park Drive, Suite 204
Post Office Box 2148
Montgomery, Alabama 36102-2148
Phone: (334) 387-7680
Fax: (334) 387-3222

CERTIFICATE OF SERVICE

I hereby certify that on November 15, 2005, I electronically filed the foregoing with the Clerk of the Court, using the CM/ECF system which will send notification of such filing to the following registered persons and that those persons not registered with the CM/ECF system were served by U.S. mail:

Mr. Johnny C. Fenn, Jr. (#238558)
Bullock Correctional Facility
Post Office Box 5107
Union Springs, AL 36089

/s/ C. Winston Sheehan, Jr.
OF COUNSEL